

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

ROSEMARY PETERS \*  
1000 Heather Ridge Drive, Apt. A-311 \*  
Frederick, Maryland 21701 \*

VS.

\* NO. 34455 EQUITY

JAMES A. PETERS, JR. \*  
1014 Peach Orchard Lane \*  
Brunswick, Maryland 21716 \*

BILL OF COMPLAINT FOR SALE IN LIEU  
OF PARTITION OF REAL ESTATE

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint for Sale in Lieu of Partition of Real Estate of ROSEMARY PETERS, by William H. Poffenbarger and AMBROSE AND POFFENBARGER, her attorneys, pursuant to the provisions of Section 14-107, of the Real Property Article of the Annotated Code of Maryland, respectfully represents unto your Honorable Court:

FIRST: That your Complainant and the Defendant, JAMES A. PETERS, JR., are owners, in fee simple, of improved real estate located at 1014 Peach Orchard Drive, Brunswick, Frederick County, State of Maryland, and being all and the same real estate conveyed unto James A. Peters, Jr. and Rosemary Peters, his wife, as tenants by the entirety, by deed from Quince Orchard Associates, Inc., dated April 6, 1976 and recorded among the Land Records of Frederick County, Maryland in Liber 984, folio 678. (A copy of said deed is attached hereto and marked as Complainant's Exhibit "A".)

SECOND: That since the acquisition of said property, the parties hereto were divorced by Decree of this Court, dated the 27th day of March, 1984, and by operation of law, the said parties are now the owners of a one-half undivided interest each as tenants in common in said real estate.

THIRD: That your Complainant avers that the property cannot be divided in kind without loss or injury to either party in interest.

WHEREFORE, your Complainant prays:

1. That this Court decree the sale of the subject property in lieu